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March 12, 1999

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
TW-A325
Washington, D.C. 20554

Re: In the Matter of Proposals for Telecommunications
Relay Service (TRS) Fund Administrator and on the
Authorization of an Additional TRS Advisory Committee
Member to Represent the Speech-Disabled Community, CC
Dkt. No. 90-571

Dear Ms. Salas:

Enclosed please find one original and four copies of Reply comments of the Council of
Organizational Representatives on National Issues Concerning People who are Deaf and Hard of
Hearing in the above captioned docket.

Sincerely,



Karen Peltz Strauss
COR Legislative Consultant
(301) 587-7466

Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

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Represent the Speech-Disabled Community)

**REPLY COMMENTS OF
THE COUNCIL OF ORGANIZATIONAL REPRESENTATIVES
ON NATIONAL ISSUES CONCERNING
PEOPLE WHO ARE DEAF OR HARD OF HEARING**

I. Introduction

The Council of Organizational Representatives on National Issues Concerning People who are Deaf or Hard of Hearing (COR)¹ submits these comments in response to the Federal Communications Commission's (FCC or Commission) Public Notice on the authorization of an additional advisory committee member to represent individuals with speech disabilities on the Interstate Relay Advisory Council of the National Exchange Carrier Association (NECA). COR is a coalition of national organizations that are committed to improving the lives of

¹ The following members of COR support these comments: Alexander Graham Bell Association, American Academy of Audiology, American Speech-Language-Hearing Association, Caption Center/WGBH, League for the Hard of Hearing, National Association of the Deaf, Registry of Interpreters for the Deaf, Self Help for Hard of Hearing People, Inc., and Telecommunications for the Deaf

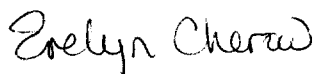
individuals who are deaf or hard of hearing. Constituencies of COR organizations provide a variety of services, including technological and telecommunications services, educational programs, support groups and self-help programs, medical, audiological, and speech-language pathology assessment and rehabilitation services, information on assistive devices and technology, and general information on other services for deaf and hard of hearing consumers. Among other things, COR serves as a bridge among interested organizations, the general public, and the community of people with disabilities on matters concerning deaf and hard of hearing individuals. COR has participated in a number of the FCC's earlier proceedings relating to the implementation of our nation's telecommunications relay services (TRS).

COR supports the Commission's proposal to add a representative from the speech disability community on the NECA TRS Advisory Committee. The function of this committee has been to provide guidance to NECA, as the interstate relay fund administrator, on TRS issues of implementation and reimbursement. On May 20, 1998, the Commission released proposed rules which would require all common carriers to provide speech-to-speech relay services within two years after publication of a final rule on this subject. In response, the Commission received a considerable number of comments showing strong support for speech-to-speech services, from both consumers and industry. See Comments of Telecommunications for the Deaf, Inc. at 14, Comments of American Speech-Language-Hearing Association at 1; Comments of the National Association of the Deaf at 3-4, Comments of Sprint at 2; Comments of Ameritech at 3; Comments of GTE at 3; Comments of President's Committee on Employment of People with Disabilities at 6, Comments of United Cerebral Palsy Associations at 3. These parties agreed that

the overwhelming benefits of providing relay access to the speech disability community far outweigh any costs that might be associated with the provision of these new relay services.

Both the FCC's notice of proposed rulemaking and the various comments in support of speech-to-speech relay services revealed a number of questions about the implementation and handling of these services. A representative from the speech disability community on the NECA TRS Advisory Committee can help to answer these questions, as these services are deployed throughout the country. In addition, this representative can provide valuable guidance to both NECA and the FCC with respect to the recovery of costs associated with speech-to-speech services. For these reasons, we strongly support the FCC's proposal to authorize an additional reimbursable position on the NECA TRS Advisory Committee for a representative from the speech disability community.

Respectfully submitted,



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Co-Chairs, COR

March 12, 1998